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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Estell L. Thomas,

Plaintiff,

v.

Louis DeJoy, Postmaster General, United
States Postal Service (Western Area)

Defendant.

Case No. 2:23-cv-00397-MMD-EJY

**Stipulation and Order to Extend Certain
Discovery Deadlines**

(First Request)

Pursuant to LR IA 6-1 and LR 26-3, *pro se* Plaintiff Estell Thomas, and Federal Defendant Louis DeJoy (collectively “the Parties”) request a 90-day extension of the close of discovery, the deadline to file dispositive motions, and all related briefing and JPTO deadlines thereafter, as follows. This request for an extension is filed at least 21 days before the earliest deadline to be extended (close of discovery). This is the first request for an extension of the discovery deadlines set by the Court in ECF No. 103.

DISCOVERY COMPLETED

The parties have completed the following disclosures and discovery:

The parties have served their respective initial disclosures.

Federal Defendant served initial discovery requests on March 28, 2025. Plaintiff has requested a thirty (30) day extension from the April 28, 2025, deadline to provide discovery responses. Currently, plaintiff’s discovery responses are due on May 28, 2025.

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DISCOVERY REMAINING

Pro se Plaintiff is still in the process of preparing her responses to Federal Defendant's initial discovery requests, which are now due on May 28, 2025, pursuant to an extension stipulated by the parties. After Plaintiff responds to Defendant's discovery requests, Defendant will depose Plaintiff and all necessary witnesses. Both parties are interested in reserving their rights to conduct additional discovery past Plaintiff's deposition.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

Pro se Plaintiff is still in the process of obtaining legal counsel. Additionally, *pro se* Plaintiff has been caring for her mother, which has limited the time and attention she has been able to give to this case. On April 28, 2025, *pro se* Plaintiff requested a 30-day extension to respond to Federal Defendant's discovery requests. This stipulated request to extend the close of discovery and all subsequent deadlines is intended to provide *pro se* Plaintiff the time she needs to hire legal counsel, response to Federal Defendant's discovery requests, and be deposed, as well as to accommodate any discovery interests by either party following her deposition. For these reasons, the parties agreed to the revised schedule below.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The extension of the remaining deadlines in the case would result in the following revised discovery schedule:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Close of Discovery	06/23/2025	09/22/2025
Dispositive Motions	07/23/2025	10/21/2025
Proposed Joint Pretrial Order	08/22/2025	11/20/2025 ¹

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¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.

1 This request for an extension of time is sought in good faith and not for any improper
2 purpose including delay.

3 Respectfully submitted this 7th day of May 2025.

4 /s/ Estell L. Thomas
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SIGAL CHATTAH
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/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
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11 **IT IS SO ORDERED:**

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UNITED STATES MAGISTRATE JUDGE

13 **DATED:** May 7, 2025
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